

3. Andron has job offices at eight to twelve project sites at any given time, for purposes of on-site supervision. All of our current projects are in New York or Connecticut. None are in New Jersey.

4. Andron is registered to do business in New Jersey. Andron's last project in New Jersey was completed about 15 years ago. About three years ago, we performed estimating services for Dwight School in Englewood, New Jersey. We performed these services at our office in Goldens Bridge, New York. We attended two or three meetings at Dwight School. The school paid us \$15,000 for our services. The two engagements mentioned in this paragraph are the only ones Andron has ever performed in New Jersey.

5. Andron does not advertise in New Jersey. We do not solicit business in New Jersey. In both of the instances mentioned in Paragraph 4, existing customers asked us to perform the services.

6. All of Plaintiff's activity which is the subject of the Complaint took place in New York.

a. Labor - The workers Plaintiff alleges it employed at the project were all members of New York Local No. 3 of the Electrical Workers union. The cost and other terms of their employment were governed by union labor agreements made and carried out in New York.

b. Material - The material Plaintiff alleges it furnished for installation at the project all came from a supplier in The Bronx, New York.

c. Management - At the time of Plaintiff's involvement in the project, Plaintiff managed its New York work from an office in Long Island City, New York.

d. Agreement - Plaintiff alleges that its representatives met with me on July 15, 2005, which Andron admits. There is a dispute about what was said at the meeting, but whatever was said, the meeting took place at a diner in The Bronx, New York.

7. Andron has voluminous project records for this project, all located at our main office in Goldens Bridge, New York.

8. All of the witnesses Andron would expect to call to testify at the trial of this action live in New York. In addition to myself, Andron still employs Frank Gabriele, who was a superintendent at the Project. Two former employees of Andron are expected to be important witnesses. Jeff Rosser, the Project Manager, works in New York City and continues to live in Putnam County, New York; Joe Contantino, a former superintendent, presently works in Connecticut, but still lives in Westchester County, New York.

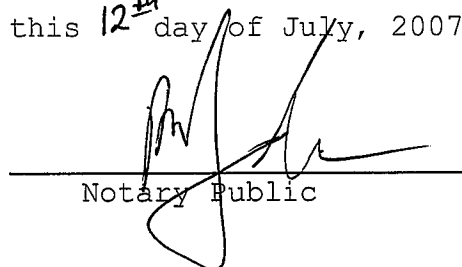
WHEREFORE, it is respectfully requested that this application be granted in all respects and that Defendants be granted such other and further relief as the Court deems just.



MARK WILSON

Sworn to before me

this 12th day of July, 2007



Notary Public

MARGARET GALLAGHER
Notary Public, State of New York
Registration No. 01GA4984143
Qualified in Westchester County
Commission Expires July 15, 2011